

Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

RENE BORROEL-LOPEZ,

Defendant.

NO. CR17-322RAJ

GOVERNMENT'S PROPOSED
VOIR DIRE

The United States of America, by and through Annette L. Hayes, United States Attorney for the Western District of Washington, and Benjamin T. Diggs, Special Assistant United States Attorney for said District, and Katheryn Kim Frierson, Assistant United States Attorney for said District, respectfully requests that in addition to the Court's General Voir Dire Questions, the following questions be asked of the prospective jury panel in this case, with the opportunity for the Government attorneys to ask appropriate follow up questions. The government also respectfully requests that the Court advise the jurors that they may ask to speak about their answers privately if any of them feel uncomfortable answering a question in front of the others.

1. Have you or anyone close to you ever lodged a complaint with a department or agency about the conduct of any law enforcement officer or personnel?

1 2. This case involves undercover officers and cooperating witnesses who may
2 have used deception in order to further the investigation. Do any of you believe it is
3 wrong for law enforcement to use such investigative techniques?
4

5 DATED this 23rd day of February, 2018.

6 Respectfully submitted,

7 ANNETTE L. HAYES
8 United States Attorney
9

10 /s/ Benjamin T. Diggs
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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant.

s/ Melissa Frank

MELISSA FRANK

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